

**UNITED STATES DISTRICT COURT**  
WESTERN DISTRICT OF TEXAS, DEL RIO DIVISION

United States of America

vs.

(1) William Smith

§  
§  
§  
§  
§

CRIMINAL COMPLAINT

CASE NUMBER: DR:21-M -00108(1)

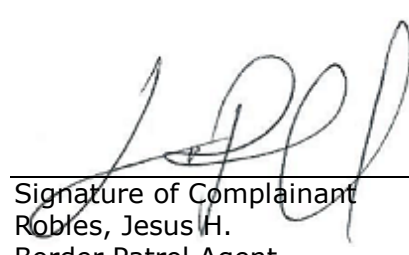
I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about **January 14, 2021** in **Maverick** county, in the **WESTERN DISTRICT OF TEXAS** defendant(s) did, conspire with other unnamed co-conspirators, to transport, or move or attempt to transport or move, certain persons, knowing or in reckless disregard of the fact that that such persons were aliens illegally present in the United States, a felony,

in violation of Title **8** United States Code, Section(s) **1324(a)(1)(A)(v)(I)**

I further state that I am a(n) **Border Patrol Agent** and that this complaint is based on the following facts: *"On January 14, 2021, William Smith a United States citizen was arrested near Eagle Pass, Texas for transporting nine illegal aliens further into the United States. The defendant was arrested while driving a blue F-250 pickup truck, bearing license plate MTT 9546. A Border Patrol Agent witnessed several subjects loading onto the defendant's vehicle in an area known for illegal crossings. Several subjects absconded from*

**Continued on the attached sheet and made a part of hereof.**

Sworn to before me and subscribed in my presence,


  
\_\_\_\_\_  
Signature of Complainant  
Robles, Jesus H.  
Border Patrol Agent

01/20/2021

File Date

at DEL RIO, Texas  
\_\_\_\_\_  
City and State

VICTOR ROBERTO GARCIA  
\_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE

  
\_\_\_\_\_  
Signature of Judicial Officer

**WESTERN DISTRICT OF TEXAS**

UNITED STATES OF AMERICA

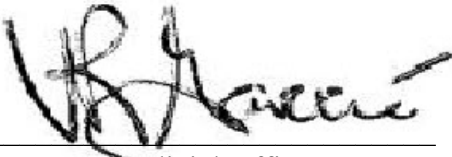
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**Continuation of Statement of Facts:**

the defendant's vehicle as the agent initiated a vehicle stop. The defendant attempted to abscond by driving away from the stop at a high rate of speed. The defendant and nine illegal aliens were arrested after several agents responded to the area. In a post Miranda interview the defendant admitted to conspiring with a subject known as "Veronica" to transport the illegal aliens for a payment of \$700 dollars per person."



Signature of Judicial Officer



Signature of Complainant